

## DOCKETED

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*Comment Received From: Patrick Owen*

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**Redwood Coast Energy Authority comments on School Bus Replacement Program**

*Additional submitted attachment is included below.*

## **Comments from Redwood Coast Energy Authority on the School Bus Replacement Program**

### **Identifying the List of Eligible Buses**

#### **What is the preferred method for Phase 1: develop a list or conduct an application process?**

We prefer option 2: “Require that each school district submit an application with basic information, such as age of the bus, address of the bus, intended usage (daily route), how many miles the bus drove last year, and student ridership.”

The information provided in the presentation given on 2/15/18 suggests that the statewide school bus data available to the California Energy Commission may be incomplete. Option 2 would be a comprehensive method of determining eligibility and would ensure the CEC’s funding decisions are based-on the most up-to-date data.

We have some preliminary data for the 32 school districts (not including charter schools) in Humboldt County, but additional time is needed to aggregate complete fleet information for school buses in Humboldt County to provide a complete picture of transportation needs. This underscores our preference for determining eligibility via an application process.

### **Proposed Distribution of Awards**

#### **Which scenario (1 – Distribute funds evenly throughout the State, or 2)-Distribute funds based on evaluation criteria) addresses the requirements of SB 110 better? Why?**

Scenario 1 (Distribute funds evenly throughout the State) should be adopted to distribute awards for school bus replacement. We agree with Dan Pires, the Transportation Director for Eureka City Schools, and support the position that rural school districts in Northern California are in great need of new, electric school buses. Scenario 1 would ensure that districts in California’s rural communities are given an equal opportunity to qualify for SB110 funding.

Scenario 1 ensures that as many school districts as possible could apply for funding. This does not mean all districts would receive that funding, but it at least provides the opportunity to apply.

SB110 gives priority “to the oldest school buses, or school buses operating in disadvantaged communities and to schools that have a majority of students eligible for free or reduced-price meals in the prior year.”

60% of students attending Humboldt County schools are eligible for FRPMs. Humboldt County does not score in the 25<sup>th</sup> percentile on CalEnviroScreen, but we are economically disadvantaged and score high in other categories.

Scenario 1 gives all communities the opportunity to apply, both those who qualify as disadvantaged under CalEnviroScreen, as well as communities who are deemed disadvantaged by other metrics.

## **Infrastructure and Workforce**

### **What type of infrastructure will you need to support your replacement bus?**

Humboldt County school buses operate in a geographically dispersed, mountainous, and rural region. As such, extended vehicle range is important. We support the Green Power Motor charging station option that has a 140-mile range capacity.

Other important bus infrastructure needs include funding for dropping additional power lines to service charging stations, installing new transformers, substations, and labor costs for installation. These other infrastructure costs total in the thousands, if not hundreds of thousands of dollars.

### **What type of training and development will you need to support your replacement bus?**

Mechanics will need to be trained to work on electric buses. Local electricians will need to be trained in servicing the new buses and associated charging infrastructure. Our local community college has an Automotive Technology Program; additional funding for e-bus curriculum would also be beneficial. Local high schools have auto shop classes and incorporating this new technology into the K-12 curriculum is another workforce development consideration.